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Attorneys for Defendants Stingl Products, LLC,

David Stingl, and Tony Sirianni

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF OREGON**

**PORTLAND DIVISION**

**ZELPRO ASSEMBLY SOLUTIONS, LLC,**

an Oregon limited liability company, and

**CALVIN RASMUSSEN**, an individual,

Plaintiffs,

v.

**STINGL PRODUCTS, LLC**, a Virginia

limited liability company, **DAVID STINGL**,

an individual, and **TONY SIRIANNI**, an

individual,

Defendants,

**NAC GROUP, INC.**, a Florida corporation,

Defendant-intervenor.

**Civil No. 11-519-ST**

**MOTION OF HOLLAND & KNIGHT LLP  
TO WITHDRAW AS COUNSEL OF  
RECORD FOR DEFENDANTS STINGL  
PRODUCTS, LLC, DAVID STINGL, AND  
TONY SIRIANNI**

**MOTION**

Holland & Knight LLP ("H&K") moves the Court under LR 83-11 for leave to withdraw as counsel of record for Defendants Stingl Products, LLC, David Stingl, and Tony Sirianni (collectively, "Defendants") in this matter. H&K represents that professional considerations require termination of the representation, and that the situation is one in which withdrawal is appropriate under the Oregon Rules of Professional Conduct and applicable Formal Ethics Opinions of the

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AND TONY SIRIANNI**

Oregon State Bar. In addition, Defendants will not be prejudiced by H&K's withdrawal because the current pretrial schedule for this case provides for amended pleadings and joinder of parties by December 9, 2011, and close of discovery by February 15, 2012, leaving ample time for Defendants to secure substitute counsel and proceed with discovery. H&K has also assured Defendants that it will fully cooperate in their efforts to promptly retain substitute counsel and to avoid jeopardy to the foregoing discovery schedule and any adverse effect on Defendants' defense of plaintiff's claims.

For these reasons, H&K respectfully moves the Court for an order granting H&K leave to withdraw as counsel of record for Defendants.

DATED this 31st day of October, 2011.

HOLLAND & KNIGHT LLP

By: /s/ Garrett S. Garfield

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**Attorneys for Defendants Stingl Products,  
LLC, David Stingl, and Tony Sirianni**

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing MOTION OF HOLLAND & KNIGHT LLP TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANTS STINGL PRODUCTS, LLC, DAVID STINGL, AND TONY SIRIANNI to be served on the following persons by CM/ECF electronically mailed notice from the Court on the date set forth below:

Leonard D. DuBoff  
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The DuBoff Law Group, LLC  
6665 SW Hampton Street, Suite 200  
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Mark McCulloch  
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1300 SW Fifth Ave., #1720  
Portland, OR 97201-5637  
Attorneys for Defendant-intervenor

And on the following persons by email and first class mail on the date set forth below:

Stingl Products, LLC, David Stingl,  
and Anthony R. Sirianni  
c/o Anthony Sirianni  
(tsirianni@tmo.blackberry.net)  
Stingl Products, LLC  
21010 SouthBank Street  
PMB #325  
Sterling, VA 20165

DATED this 31st day of October, 2011.

/s/ Garrett S. Garfield  
Garrett S. Garfield

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